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To the Postal Rate Commission;

This is my appeal of a decision to close the Spring Dale, WV, post office. The zip code is 25986 and the document number is 1382525-25986. 2011 NOV 16 P 2:47

POSTAL REGULATORY COMMISSION
OFFICE OF THE SECRETARY
This letter of appeal by me as a postal customer at the Spring Dale, WV post office will probably be considered by some as irrelevant, emotional, or sarcastic. These and other reasons to disregard or ignore the information and material I am providing here would be symptomatic of a sterile legal process that never applies the spirit of the law.

I could perhaps gain more respect and serious consideration by making detailed reference to statute law or to a study submitted to the Postal Regulatory Commission, dated August 2011 and titled "Studies of Social and Commercial Benefits of Postal Services: ECONOMIC EFFECTS OF POST OFFICES". It is indeed pleasing to see that this study does bring into serious question the reality of lost jobs within a zip code, impact on business and other factors. I could quote from your 'Findings, Significance, and Limitations' on page nine as follows: "All models produced a similar negative magnitude of impact from a post office closure of roughly six jobs lost in the ZIP code, with modest variation across the models in standard errors and statistical significance. The alternative models led to similar point estimates, with significance levels slightly above and slightly below traditional minimum standards of significance. As we added control variables to our GLS model, we did not see much added strength of the model or of the significance of our difference-in-differences variable's coefficient. "

The problem is that the study is inconclusive at best and is consistent with the futile USPS dependence on methods to show, without reinforcing data, various reasons a post office should close. The reasons used by USPS for closing the Spring Dale P.O. are even more flawed. The closure process advances blindly with no consideration of the many suggestions made by the customers. We asked that consideration be made to change the EAS level and also decrease the lease costs dramatically by moving the P.O. into a nice building formally used as a post office. We asked for the results of a long term follow-up study of other rural communities that lost their P.O.'s decades ago. We received none because there is none. Again, historical supporting evidence for replacing a P.O. with mail boxes is nonexistent.

These and other ideas have been completely ignored. As always, big brother knows best. We have seen this fail in the past, and this country is about to see it fail again. In 2001, Fayette County, WV faced the closure of its community schools. As will be the case here, the communities were forced to raise large amounts of money to defeat school consolidation in court (and set precedent). We had been informed by the government that small community schools were interfering with a good education. Most of our state's schools have consolidated and now we are seeing bad results from them 10 years later. Reading levels have continuously fallen from an all time high in 1992, and now math levels are dropping; however, the small community schools we saved are thriving and often scoring above state average on proficiency tests. I am attempting to show that decisions to close post offices are often identical to closing schools. It looks good to those who live in the box, but actually is quite harmful. In Spring Dale,

we submitted evidence to the USPS that the effect of P.O. closure in our unique community could, in reality, be fatal to some seniors, and distressful to others. This community has always used the community P.O. as a lifeline. Visits to the post office are noticed, and a failure to show up results in a phone call or visit to the person in question. We have many elderly customers. Last winter one of them fell on ice and was barely able to get in her car. The only place she knew to go to was the post office for help. Customers at this post office will notice others in the lobby or parking lot that need immediate assistance in some form. The USPS considers mailboxes or an alternative P.O. 4.1 miles away as a solution that provides regular and reliable service. This is not true. This is a reversal in direction for many and it becomes 8.2 miles. Some of these people come here because their post office closed long ago. It is not justifiable or appropriate to do this to them again. These matters may seem trivial to those who have never enjoyed rural life, but rural life requires rural accommodations.

I have attached an article by Carol Miller titled, "Closing a Rural P.O. Can Be a K.O. Punch". He first wrote that article after the post office he used closed in 1995. He has witnessed the impact of it and now warns all of us that both the community and the entire country will suffer. He stated that twenty-five years ago, the federal plan was to close 12,000 small post offices. Appealing to patriotism, an article reminded Congress that "there is a flag that bravely flies out front. Its presence constitutes red-white-and-blue proof that the town still exists."

He quotes one of our Senators here in West Virginia, "When the post office is closed, the flag comes down. When the human side of government closes its doors, we're all in trouble." He endorses my opinion on the similarity of school closures and post office closures when he says, "Post office closure paired with school closure and consolidation are extinguishing frontier and rural communities. They are daily reminders that we are being cut out of the mainstream. These are reversals of the nation's earliest commitments to mail service and accessible public education. Rural America is not dying. It is being killed by bad policy decisions".

He warns us that The United States has gone from proudly providing Rural Free Delivery (RFD) to the privatized Highway Contract Route (HCR) cluster box system. At our boxes [or mail boxes], depending on the season, we wade through water, mud, and snow, and try not to slip on the ice to get our mail. The boxes are not accessible to people with mobility disabilities, meaning they cannot retrieve their own mail. They must either have someone else get their mail or buy a post office box and travel to the closest real post office.

As he says, "Nothing brings home to a community how absolutely unimportant they are to the federal government more than losing a post office. First you lose the post office, then you lose the zip code and, the final blow, for postal purposes you lose the very name of your town."

I ask that you read the article, as included, and consider his opinions, and that, for reasons of necessity and compassion, our post office remains available for those who depend on it.

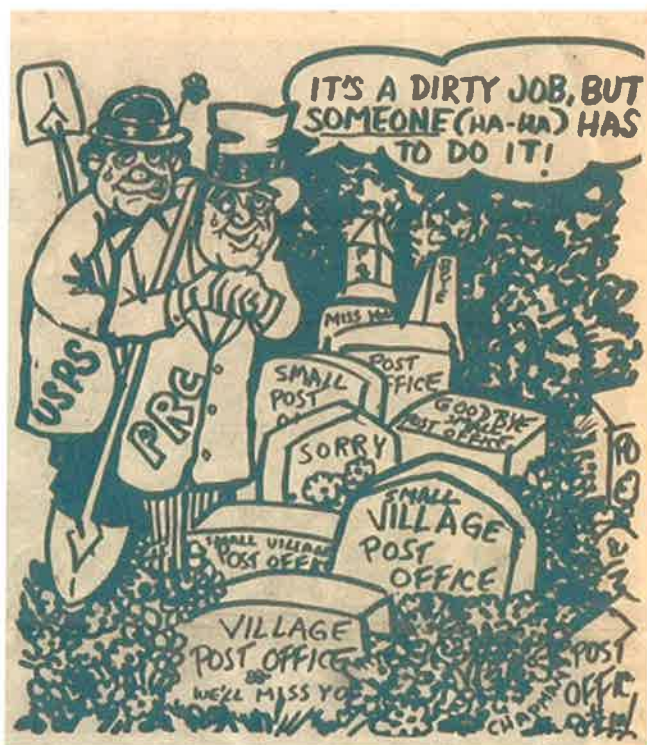
Respectfully,

 Angie Brown

Closing a Rural P.O. Can Be a K.O. Punch

By Carol Miller

Another round of rural post office closings has been announced. Carol Miller, whose New Mexico post office closed six years ago, tells residents to resist with all their might.



Enchantment/New Mexico REC A cartoon from New

Mexico's *Enchanted*, published during a brutal round of rural post office closings in 1986. Here we go again! The media noticed a plan to close a lot of post offices, most of them in frontier and rural communities. This resulted in a one-day national news story. Then everyone – except the people affected – forgot about it and went on their way.

Rural people want to know how come whenever someone decides it's time to cut federal spending that rural post offices are always first, or nearly first, to go.

The first time I ran into this was in February 1986; *Enchantment*, the monthly paper of the New Mexico Rural Electric Cooperative Association, ran an article entitled “The Post Office’s anti-rural crusade” with a cartoon showing the burial of village post offices. At that time, twenty-five years ago, the federal plan was to close 12,000 small post offices. Appealing to patriotism, the article reminded Congress that “there is a flag that bravely flies out front. Its presence constitutes red-white-and-blue proof that the town still exists.”

The hero of that era was Jennings Randolph, then U.S. Senator from West Virginia. In a warning just as appropriate today, Randolph pointed out, “When the post office is closed, the flag comes down. When the human side of government closes its doors, we’re all in trouble.”

Despite passionate defenders, a lot of communities lost their post offices in that round of closures.

Suddenly it was 1994 and a new wave of rural post office closures began. This time my home community, Ojo Sarco, New Mexico 87550, was threatened with being literally wiped off the map.

No community has ever accepted a post office closure quietly. Residents fight back, appeal to the postal service, ask their Congressional representatives for help, go to meetings and hearings and sign petitions. Some communities win and keep a post office. Many more communities lose.

My community did all of the above – but we lost and the post office closed in 1995. At the final local meeting, arranged by Senator Jeff Bingaman, the representative of the Regional Postal Service in Denver let our community know that we were not going to be saved. We were informed that our post office “cost” the USPS \$1,500 a year more than it made in sales of stamps and money orders. That was too big a federal investment for our small, isolated community.

The United States has gone from proudly providing Rural Free Delivery (RFD) to the privatized Highway Contract Route (HCR) cluster box system. At our cluster boxes, depending on the season, we wade through water, mud, and snow, and try not to slip on the ice to get our mail. The boxes are not accessible to people with mobility disabilities, meaning they cannot retrieve their own mail. They must either have someone else get their mail or buy a post office box and travel to the closest real post office.

Nothing brings home to a community how absolutely unimportant they are to the federal government more than losing a post office. First you lose the post office, then you lose the zip code and, the final blow, for postal purposes you lose the very name of your town.

The U.S. Post Office predates the Declaration of Independence

The United States postal system was created by the Second Continental Congress, which met in 1775, a year before the Declaration of Independence. Benjamin Franklin was appointed to be the first Postmaster General. Franklin adopted B. Free Franklin, Postmaster for his official signature as shown on his commemorative stamp from 2006.

Stamps from the U.S.A. Benjamin Franklin, the first Postmaster General of the U.S., used B. Free Franklin as his signature while in that office.

The founders of the nation recognized that a strong communication system was essential to weave far-flung places into a nation. By emphasizing service, this new postal system was also a way to prove that the new country was throwing off the ways of the Crown. Before the American Revolution the British system required postal services to be profitable. The leaders of the new nation-in-information rejected profit in the provision of such a basic service.

George Washington attributed the victory in the Revolutionary War to mail delivery and its importance in linking “the distant parts of the country by a due attention to the Post Office and Post Roads.”

When the U.S. Constitution was written and ratified, post offices were in the enumeration of Powers Granted to Congress (Article 1. Section 8.g.). As the country grew so did the Post Office Department. It helped ease the hardships of settlement and rural life by tying small communities into the nation. How far away and dreamlike those days feel today.

Fast Forward 200 years to the Postal Reorganization Act of 1970

Forgetting the revolutionary intention of the Founding Fathers to provide essential services without requiring them to make a profit; the Post Office hit the chopping block in 1970 when President Richard Nixon signed the Postal Reorganization Act. This law demoted the Post Office Department from a cabinet level position and turned it into the United States Postal Service with a corporate organizational structure.

Even with the reorganization of the Post Office, Congress still supported the idea of universal service. Section 101 of the law states “The Postal Service shall have as its basic function the obligation to provide postal services to bind the Nation together through the personal, educational, literary, and business correspondence of the people. It shall provide prompt, reliable, and efficient services to patrons in all areas and shall render postal services to all communities.”

This same section states “The Postal Service shall provide a maximum degree of effective and regular postal service to rural areas, communities, and small towns where post offices are not self-sustaining. **No small post office shall be closed solely for operating at a deficit**, it being the specific intent of the Congress that effective postal services be insured to residents of both urban and rural communities” (emphasis added).

The Postal Service has found several ways to work around these statutory provisions over the years. Currently in Congress, there are a number of bills that would eliminate completely these few remaining provisions that offer shreds of protection to communities.

In 1997, Congress asked the General Accounting Office (now named the Governmental Accountability

Office) to report on post office closures resulting from the 1970 law. That report found that between 1970 and 1996, there were 3,924 closures. All of these were rural and few were full time.

The affected communities had:

- Populations ranging from 30 to 2,143, with an average population of 206 (median population of 80).
- Businesses ranging in number from 1 to 39, with an average and median of 6 and 5.
- 10 to 44 hours of window service per week, with a weekly average of 28 hours.
- Postmaster salaries ranged from \$5,773 to \$31,664 per year, yearly average = \$13,664.
- In all but four of these communities, the annual operating costs of these post offices exceeded their postal revenues.

In 1995, ninety-three post offices were closed and they were 100% rural.

The Fatal Blow: PL109-435 Postal Accountability and Enhancement Act of 2006

This law was designed to end what it described as “the postal monopoly.” The primary weapon was a remarkable change in the funding of postal service employee benefits - a disastrous mandate that required \$5 billion per year be deposited into an escrow account to prepay health and pension benefits.

Many media outlets have reported on the link between these payments and the present economic condition of the USPS.

In 2011, Senator Thomas Carper, the Senate subcommittee chair on the post office, told National Public Radio that these pension prepayments are a major cause of the Postal Service's red ink. Carper said, “We shouldn't ask the Postal Service what we ask of no other state and local government and, as far as I know, no other business enterprise to do - and that is to upfront set aside enormous amounts of money to meet health care needs of potential pensioners.”

The Postal Service has not gone broke. What we are witnessing is a fatal blow by Congress to the financial health of USPS via a mandate that all future pensions must be prepaid.

Yet Carper also is a sponsor of one of the bills currently in Congress that will, for the first time, officially let the postal service close post offices for economic reasons. The Wall Street Journal reports that a bill introduced by Carper would repeal wording in U.S. law that says, “no small post office shall be closed solely for operating at a deficit.” Currently, the postal service must cite other reasons - in addition to finances - such as unsafe conditions or a retiring postmaster.

Carol Miller, The post office at Chamisal, New Mexico 87521, a flag waving survivor, for now.

Here we are, back to a new and very extensive round of post office closures. The two thousand at the top

of the closure list are primarily rural and frontier. (Find the [state-by-state closure list here](#).) Yet the ultimate closure list might reach half of all post offices, as many as 16,000 within a year. This attack on the oldest public service of our democracy is now a shared rural and urban disaster.

There are health care impacts to rural post office closures. Rural pharmacies are even more rare than post offices and many people receive mail-order drugs. Many medications are supposed to be kept at room temperature, not subjected to the extremes of summer heat and winter cold as they are in highway cluster boxes.

The Wall Street Journal described one example from North Dakota.

"The area's only major hospital and pharmacy is in Hettinger, ND, 40 miles away and over the state line from Prairie City. Before, when an elderly person or farmer in Prairie City quickly needed an antibiotic or other medication, a pharmacist in Hettinger would rush prescriptions to the Hettinger post office, catching the mail carrier who each day traveled from Hettinger to the Prairie City post office. ... now Prairie City mail is sorted and delivered on a rural route out of Bison, SD, delaying the delivery of medicine from Hettinger by two or three days, says Dr. Brian Willoughby, of West River Health Services in Hettinger.

"When they cut these services, there are multiple spinoff consequences for these older people out there in the middle of nowhere, but the bureaucrats sort of forget about that."

My advice to every community on the closure list is to fight back - do whatever it takes to keep this constitutionally guaranteed service in your community.

Post office closure paired with school closure and consolidation are extinguishing frontier and rural communities. They are daily reminders that we are being cut out of the mainstream. These are reversals of the nation's earliest commitments to mail service and accessible public education.

Rural America is not dying. It is being killed by bad policy decisions.